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September 19, 2022

BY ECF

Honorable Richard J. Sullivan
United States Circuit Judge for
the Second Circuit Court of Appeals
40 Foley Square
New York, NY 10007-1312

Re: United States v. John Kovac, 15 Cr. 514 (RJS)

Hon. Sullivan:

I write with consent of the government and probation to request a 45-day adjournment of sentencing in this matter, to any date convenient to the Court. This is my second request for an adjournment and is made as Dr. Mariani, the addiction expert, needs additional time to work with Mr. Kovac. Dr. Mariani informs me that his schedule has made it difficult for him to fully confer with Mr. Kovac and with Officer Fordeingham. Dr. Mariani needs an additional three weeks to prepare his report.

Officer Foderingham continues to supervise Mr. Kovac who is remain in drug treatment, has tested negative for drugs, is participating in all mandated programs, is attending school, and is otherwise compliant with all requirements of his supervised release.

Good cause is shown for the requested extension as psychiatrist John J. Mariani M.D. needs time and his schedule, given the aftermath of the pandemic, is unfortunately very full.

Both the government and probation consent to this request.

I thank the Court for its time and consideration of this request.

Respectfully submitted,

/s/Sabrina P. Shroff
Counsel for Mr. John Kovac

SPS/mtf

cc: USPO Foderingham
Dr. John Mariani

IT IS HEREBY ORDERED THAT the VOSR Sentencing in this matter, which is currently scheduled for September 26, 2022, will instead take place on Monday, October 17, 2022 at 10:00 a.m. in Courtroom 21C at the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, New York 10007. Mr. Kovac shall submit his sentencing submission by Friday, October 7, 2022. The government shall submit its sentencing submission by Friday, October 14, 2022. No further requests for adjournment of the VOSR sentencing in this matter will be granted under any circumstance.

Dated: September 20, 2022
New York, New York


Hon. Richard J. Sullivan
United States Circuit Judge
Sitting by Designation